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Attorneys for Plaintiff
UNITED STATES OF AMERICA

UNITED STATES DISTRICT COURT

FOR THE CENTRAL DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,

Plaintiff,

v.

JOSE LANDA-RODRIGUEZ, et al.,
[#2-GABRIEL ZENDEJAS-CHAVEZ]

Defendant.

No. 2:18-cr-00173(A)-GW-2

GOVERNMENT'S PROPOSED VERDICT FORM

Trial Date: August 2, 2022

Trial Time: 8:30 a.m.

Location: Courtroom of the Hon.
George Wu

Plaintiff United States of America, by and through its counsel
of record, the Acting United States Attorney for the Central District
of California and Assistant United States Attorneys Shawn J. Nelson,
Gregory Bernstein, Keith D. Ellison, and Gregg E. Marmaro, hereby

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1 submits the Government's Proposed Verdict Form in the above-captioned
2 case.¹

3 Dated: June 24, 2022

Respectfully submitted,

4 STEPHANIE S. CHRISTENSEN
Acting United States Attorney

5 SCOTT M. GARRINGER
6 Assistant United States Attorney
7 Chief, Criminal Division

8 /s/

9 SHAWN J. NELSON
10 GREGORY BERNSTEIN
11 KEITH D. ELLISON
12 GREGG E. MARMARO
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13 Attorneys for Plaintiff
14 UNITED STATES OF AMERICA
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28 ¹ On July 23, 2022, counsel for defendant represented that
defendant would be filing his own proposed verdict form.

COUNT ONE

Racketeering Conspiracy

1. We, the Jury, unanimously find the defendant GABRIEL ZENDEJAS-CHAVEZ (*check one*):

_____ GUILTY or

_____ NOT GUILTY

as charged in Count One of the First Superseding Indictment.

(If the response to Question 1 is Guilty, you must also answer Question 2. If the response to Question 1 is Not Guilty, proceed directly to Question 5.)

2. We, the Jury, having found the defendant GABRIEL ZENDEJAS-CHAVEZ guilty of Count One, further unanimously find that it was reasonably foreseeable to the defendant that the overall conspiracy would engage in a pattern of racketeering activity consisting of at least the following crimes (*select all that apply*):

_____ Murder

_____ Extortion

_____ Drug Trafficking

_____ Witness Tampering

_____ Witness Retaliation

_____ Money Laundering

(continued on next page)

1 *(If the response to Question 1 is Guilty and in reaching such a*
2 *verdict you unanimously find that the pattern of racketeering*
3 *activity would include drug trafficking, you must also answer*
4 *Questions 3 and 4. If the response to Question 1 is Not Guilty, or*
5 *if you found the defendant Guilty but further found that the pattern*
6 *of racketeering activity would not include drug trafficking, proceed*
7 *directly to Question 5.)*

8
9 3. We, the Jury, having found the defendant GABRIEL ZENDEJAS-
10 CHAVEZ guilty of Count One, further unanimously find that it was
11 reasonably foreseeable to the defendant that the overall drug
12 conspiracy would involve the following amount of methamphetamine
13 *(pick the largest applicable amount):*

14 a. At least 50 grams of methamphetamine.

15 _____ YES

16 _____ NO

17 b. At least 5 grams of methamphetamine.

18 _____ YES

19 _____ NO

20 c. Less than 5 grams of methamphetamine.

21 _____ YES

22 _____ NO

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25 *(continued on next page)*
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1 4. We, the Jury, having found the defendant GABRIEL ZENDEJAS-
2 CHAVEZ guilty of Count One, further unanimously find that it was
3 reasonably foreseeable to the defendant that the overall drug
4 conspiracy would involve the following amount of a mixture or
5 substance containing a detectable amount of heroin (*check one*):

6 At least 100 grams of a mixture or substance containing a
7 detectable amount of heroin.

8 _____ YES

9 _____ NO

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COUNT FIVE

Drug Trafficking Conspiracy

5. We, the Jury, unanimously find the defendant GABRIEL ZENDEJAS-CHAVEZ (*check one*):

_____ GUILTY or

_____ NOT GUILTY

as charged in Count Five of the First Superseding Indictment.

(If the response to Question 5 is Guilty, you must also answer Questions 6 and 7. If the response to Question 4 is Not Guilty, proceed directly to Question 8.)

6. We, the Jury, having found the defendant GABRIEL ZENDEJAS-CHAVEZ guilty of Count Five, further unanimously find that it was reasonably foreseeable to the that the overall drug conspiracy would involve the following amount of methamphetamine (*pick the largest applicable amount*):

a. At least 50 grams of methamphetamine.

_____ YES

_____ NO

b. At least 5 grams of methamphetamine.

_____ YES

_____ NO

c. Less than 5 grams of methamphetamine.

_____ YES

_____ NO

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1 7. We, the Jury, having found the defendant GABRIEL ZENDEJAS-
2 CHAVEZ guilty of Count Five, further unanimously find that it was
3 reasonably foreseeable to the defendant that the overall drug
4 conspiracy would involve the following amount of a mixture or
5 substance containing a detectable amount of heroin:

6 At least 100 grams of a mixture or substance containing a
7 detectable amount of heroin.

8 _____ YES

9 _____ NO

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12 (*continued on next page*)
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COUNT SEVEN

Possession of Methamphetamine with Intent to Distribute,
Aiding and Abetting

8. We, the Jury, unanimously find defendant GABRIEL ZENDEJAS-CHAVEZ (*check one*):

_____ GUILTY or

_____ NOT GUILTY

as charged in Count Seven of the First Superseding Indictment.

(If your response to Question 8 is Guilty, you must also answer Question 9. If the response to Question 8 is Not Guilty, proceed directly to Question 10.)

9. We, the Jury, having found the defendant GABRIEL ZENDEJAS-CHAVEZ guilty of Count Seven, further unanimously find that the defendant aided and abetted in the possession with intent to distribute the following amount of methamphetamine (*check one*):

At least 5 grams of methamphetamine.

_____ YES

_____ NO

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COUNT EIGHT

Possession of Heroin with Intent to Distribute,
Aiding and Abetting

10. We, the Jury, unanimously find defendant GABRIEL ZENDEJAS-
CHAVEZ (*check one*):

_____ GUILTY or

_____ NOT GUILTY

as charged in Count Eight of the First Superseding Indictment.

DATED _____ in Los Angeles, California

[FOREPERSON OF THE JURY]